

COASTAL CONSERVANCY

Staff Recommendation

March 24, 2016

EUREKA WATERFRONT TRAIL CONSTRUCTION

Project No. 16-019-01

Project Manager: Peter Jarausch

RECOMMENDED ACTION: Authorization to disburse up to \$1,000,000 to the City of Eureka for construction of three segments of the Eureka Waterfront Trail, creating approximately 3.75 miles of the California Coastal Trail, in the City of Eureka.

LOCATION: City of Eureka, Humboldt County

PROGRAM CATEGORY: Public Access

EXHIBITS

Exhibit 1: [Location and Site map](#)

Exhibit 2: [Project Letters](#)

Exhibit 3: [CEQA Documents](#)

RESOLUTION AND FINDINGS:

Staff recommends that the State Coastal Conservancy adopt the following resolution pursuant to Sections 31400-31410 of the Public Resources Code:

“The State Coastal Conservancy hereby authorizes the disbursement of up to one million dollars (\$1,000,000) to the City of Eureka for construction of three segments of the Eureka Waterfront Trail, creating approximately 3.75 miles of the California Coastal Trail, in the City of Eureka, subject to the following conditions:

- 1) Prior to the disbursement of any funds for each of the three project components, the City of Eureka shall submit for the review and approval of the Executive Officer, for that component:
 - a. A work plan, schedule, budget, and the names of any contractors and subcontractors to be retained.
 - b. Evidence that all necessary permits and approvals have been obtained.
 - c. A plan for the installation of a sign acknowledging Conservancy funding.
- 2) The City of Eureka shall ensure the project is consistent with the Conservancy’s “Standards and Recommendations for Accessway Location and Development” and with all applicable

federal and state statutes, regulations, and guidelines governing access for persons with disabilities; and

3) The City of Eureka shall install coastal trail emblems at locations to be determined in consultation with the Conservancy, including along existing segments of the Eureka Waterfront Trail.”

Staff further recommends that the Conservancy adopt the following findings:

“Based on the accompanying staff report and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 9 of Division 21 of the Public Resources Code, regarding a system of public accessways.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria and Guidelines.
3. The Conservancy has independently reviewed and considered the mitigated negative declarations prepared by the City of Eureka pursuant to the California Environmental Quality Act for each of the three project components: *Eureka Waterfront Trail Project Phase A Initial Study and Mitigated Negative Declaration*; adopted by the City of Eureka on October 21, 2014; the *Eureka Waterfront Coastal Trail Initial Study and Mitigated Negative Declaration*, adopted by the City of Eureka on June 19, 2012; and the *Eureka Waterfront Trail Phase C CEQA Initial Study & Proposed Negative Declaration*, adopted by the City of Eureka on March 28, 2014, attached to the accompanying staff recommendation collectively as Exhibit 3, and finds that the project, as mitigated, avoids, reduces or mitigates the possible significant environmental effects and that there is no substantial evidence that the project will have a significant effect on the environment, as defined in 14 California Code of Regulations Section 15382.
4. The proposed project serves greater than local needs.”

PROJECT SUMMARY:

Staff recommends the Conservancy authorize the disbursement of up to \$1,000,000 to the City of Eureka (City) for construction of three segments of the Eureka Waterfront Trail, which is designated as the California Coastal Trail (CCT). This project will increase public access to the Eureka waterfront by constructing a Class I trail along much of the City’s waterfront, and will connect to two existing sections of the Eureka Waterfront Trail that were constructed with Conservancy assistance. The project will complete the Eureka Waterfront Trail. In addition, the trail will serve as a segment of three regional and state trail systems: the Humboldt Bay Trail, the CCT, and the Pacific Coast Bike Route.

The proposed 3.75 miles of new trail will consist of 8 to 10 foot wide paved sections with gravel shoulders, meeting Caltrans Class I bikeway standards. The alignment was carefully chosen to minimize impacts as well as balance the needs of the trail with neighboring uses, including street crossings, a rail line, and local businesses. In addition to the paved sections, the new trail will include a boardwalk section to avoid impacts to wetlands and seven bridges. The project also includes installation of trailheads, interpretive signs, parking and lighting. Trail drainage and

buffers are specifically designed to minimize impacts to sensitive areas. When the proposed project is complete, the Eureka Waterfront Trail will be 6.3 miles in length.

While serving as an important new section of the California Coastal Trail and the Humboldt Bay Trail, the proposed project will also help knit the city together. The trail will provide a safe crossing from residential areas east of Highway 101 to and along Humboldt Bay. Previously inaccessible parts of the Bay's shoreline will now be accessible, enabling the public to enjoy the quiet, natural beauty of the area. The trail will also bring residents directly to the restored Old Town area with its many shops and services. Tourists who frequently drive through the area can spend additional time exploring the edge of Humboldt Bay, historic sections of town, as well as passing by businesses that rely on the Bay.

For planning purposes, the proposed trail is divided into three segments, referred to by the City as Phase A, Phase B and Phase C (see Exhibit 1). Phase A includes just over a mile of new trail starting in the southwest corner of the waterfront where an existing section of Eureka Waterfront Trail known as the Hikshari Trail ends and finishing at Del Norte Street. This section of trail is primarily between the Bay Shore Mall and Humboldt Bay. The property is generally undeveloped open space with some wetlands; at several locations the trail width will be reduced to 8 feet wide to avoid impacts to wetlands. Just north of the Mall the trail will enter Parcel 4 and there will be a small nature based playground. This section will also include several viewing platforms.

As part of Phase A, some Conservancy funds may be used for the demolition of blighted structures on property known as Parcel 4 (Humboldt County Assessor's Parcel Nos. 007-061-06 and 007-071-14). Parcel 4 was acquired by the City in 1986 with Conservancy funding as part of the Palco Marsh acquisition. The Parcel 4 structures are remnants of the Holmes-Eureka Lumber Mill and in recent years have become an attractive nuisance for illegal activities and homeless encampments. Demolition will include removal of all of the above ground concrete, which will then be ground up and recycled for use in trail construction. This will clean up the area and make it comfortable for the general public to use the trail through this area and to enjoy bird watching, hiking, and impressive views of Humboldt Bay from Parcel 4.

Phase B is an approximately 1.38 mile multi-use trail along Waterfront Drive and Railroad Avenue, stretching from the end of Phase A at W. Del Norte Street to C Street in Old Town Eureka, and connecting to the Eureka Boardwalk, an existing section of the Eureka Waterfront Trail. This portion of the project will include trail surfacing/resurfacing, trail heads, interpretive signs, and new crossings. This is the most urban section of the trail and highlights the working parts of the Eureka Waterfront including light industrial businesses, a public marina, and fishing terminal.

Phase C is an approximately 1.17 mile multi-use trail between the end of the Eureka Boardwalk at Front Street in Old Town Eureka and Tydd Street. The trail will serve as both an important non-motorized transportation/commuter corridor and a recreational facility by connecting Old Town with residential areas in Eureka and the bicycle route to the City of Arcata. It will include construction of a new Class I trail; boardwalk; three bridges; viewing areas and interpretive signs, public safety lighting. This section will open a part of the Eureka Waterfront that is currently inaccessible to the public.

The City of Eureka is qualified to carry out this project. It has demonstrated a strong commitment to and capacity for developing public access opportunities on its waterfront, implementing a number of successful public access projects. Most recently this includes the 1.5 mile long Hikshari' Trail along the southern part of the Eureka Waterfront which was completed in 2013, and constructed in part with Conservancy funds.

Site Description: The proposed project will add 3.75 miles to the Eureka Waterfront Trail, extending from Del Norte Street in the south to Tydd Street in the north (see Exhibit 1). It encompasses the majority of the bay front lands in the City of Eureka, the largest city in Humboldt County. This ranges from open space and natural resource lands on the southern and northern edges of town to industrial and commercial in the center.

The City of Eureka has divided the project into three phases for construction purposes, but these also delineate distinct areas within the city. The Phase A site is a mixture of open space lands and former industrial sites. Parcel 4, in the middle of this section, was previously a lumber mill and is now a mixture of riparian vegetation, uplands, and hollowed out concrete structures. This area is not currently visible to the general public because it is between Humboldt Bay and the Eureka Mall.

Phase B traverses a largely urban and industrial section of the waterfront. This section will connect to the existing Eureka Boardwalk through the heart of Old Town Eureka. The boardwalk was constructed in 2000, in part with Conservancy funds. It will highlight the active industrial activities which are part of a working waterfront, and, will give residents and tourists the opportunity to explore the edge of Humboldt Bay.

Phase C extends north and east from Front Street 1.17 miles to Tydd Street, a residential part of Eureka. Starting just east of Old Town Eureka it will pass through open space land, marsh and upland habitats. It will include a new section of boardwalk with expansive views of Humboldt Bay while also providing a non-motorized connection between residential areas in Eureka and Old Town.

A number of areas along the proposed trail route have been used as homeless encampments. The City of Eureka and the County of Humboldt are moving forward with a new strategy to more effectively provide services and housing. This partnership, along with the trail bringing more members of the public into the area should reduce the amount of camping and is expected to make the area feel safer for the general public.

Project History:

The Conservancy has a long history of assistance to the City of Eureka in its effort to restore the City's waterfront, dating back to the late 1970s and through the 1980s. Over that period the Conservancy provided nearly \$1.3 million dollars to assist the City with public access improvements along the northern waterfront. In January 1993 the City committed itself to revitalizing the Old Town District waterfront, improving historic public access to Humboldt Bay and the coast and returning the commercial hub of the city to the community. Since then, the City has undertaken a variety of waterfront restoration projects with public access components, including the Adorni recreation/community center and the Wharfinger Building events center, both of which include segments of waterfront trail. As noted above, the City constructed the Eureka Boardwalk, partially funded by \$500,000 in Conservancy funds, in 2002, and the

Fishermen's Work Area and Commercial Dock, designed to allow the public to see fishermen at work and funded in part by a \$1,000,000 Conservancy grant in 2006.

Planning for the Eureka Waterfront Trail took its first steps forward with the Humboldt Bay Trails Feasibility Study (2001) funded by the Conservancy. It provided recommendations for non-motorized access to and around Humboldt Bay and prioritized the Hikshari' Trail at the very southern end of the City of Eureka. Construction of the Hikshari' Trail was completed in 2013. The Humboldt County Coastal Trail Implementation Strategy (2011), also funded by the Conservancy, took this a step further and outlined a potential route along the Eureka waterfront for the CCT. As part of that study, the Redwood Community Action Agency worked with the City of Eureka to complete engineering and design plans for what has now become "Phase B" of the Eureka Waterfront Trail. Since that time the City of Eureka has embraced the Waterfront Trail project and completed environmental documents, much of the permitting, and has fundraised extensively for construction funding.

PROJECT FINANCING

Coastal Conservancy	\$1,000,000
Caltrans no-freeway alternate funding (Phase A)	\$1,200,000
Regional Transportation Program (Phases B&C)	500,000
Alternative Transportation Program (Phases B&C)	2,298,000
Humboldt County Association of Governments (Phases B&C)	100,000
Project Total	5,098,000

The anticipated source for the Conservancy funds is a FY 2013-2014 appropriation from the Safe Drinking Water, Water Quality and Supply, Flood Control, River and Coastal Protection Bond Act of 2006, Public Resources Code Section 75001 *et seq.* (Proposition 84). Proposition 84 authorizes the Conservancy's use of these funds for to promote access to and enjoyment of coastal resources through projects undertaken pursuant to the Conservancy's enabling legislation (Division 21 of the Public Resources Code). The proposed project will promote access to and enjoyment of Humboldt Bay by development of new sections of the CCT along Humboldt Bay through the City of Eureka. The project is consistent with Division 21 of the Public Resources Code, as described below. Accordingly, the proposed project is an appropriate use of Proposition 84 funds.

CONSISTENCY WITH CONSERVANCY'S ENABLING LEGISLATION:

The proposed project will be undertaken pursuant to Chapter 9 of Division 21 of the Public Resources Code (Sections 31400 *et seq.*) relating to the provision of public access to the coast. Section 31400 states that the Conservancy shall have a principal role in the implementation of a system of public accessways to and along the state's coastline.

In particular, this project is consistent with Public Resources Code Section 31400.1, which allows the Conservancy to provide grants to public agencies to develop lands for public access purposes to and along the coast; and 31400.3, in that the Conservancy may provide such

assistance as is required to aid public agencies in establishing a system of public accessways. The proposed authorization will enable the City of Eureka to develop additional segments of the CCT along Humboldt Bay. Consistent with Section 31400.2, the amount of funding provided by the Conservancy for this project is based upon the amount of funding available for coastal public accessway projects, the fiscal resources of MLT, the urgency of this project and the Conservancy's Project Selection Criteria and Guidelines, as described below.

CONSISTENCY WITH CONSERVANCY'S ACCESS PROGRAM STANDARDS:

Standard No. 8, Trails: The proposed project will provide a continuous trail that avoids geologically unstable and erosive soils.

Standard No. 10, Coastal Bikeways: The proposed project will meet Class I bikeway standards whenever possible.

Standard No. 12, Support Facilities: The proposed project will provide support facilities such as signage and parking lots.

Standard No. 13, Barrier-Free Access: The proposed project will meet Americans with Disabilities Act (ADA) standards.

CONSISTENCY WITH CONSERVANCY'S 2013 STRATEGIC PLAN GOAL(S) & OBJECTIVE(S), AS REVISED JUNE 25, 2015:

Consistent with **Goal 1, Objective B** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will sign existing segments of the CCT.

Consistent with **Goal 1, Objective D** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will construct new segments of the CCT, and connect existing segments, resulting in a contiguous stretch of 5.25 miles.

Consistent with **Goal 2, Objective B** of the Conservancy's 2013-2018 Strategic Plan, the proposed project will open coastal areas that are currently inaccessible to public use.

CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA & GUIDELINES:

The proposed project is consistent with the Conservancy's Project Selection Criteria and Guidelines, last updated on October 2, 2014, in the following respects:

Required Criteria

1. **Promotion of the Conservancy's statutory programs and purposes:** See the "Consistency with Conservancy's Enabling Legislation" section above.
2. **Consistency with purposes of the funding source:** See the "Project Financing" section above.
3. **Promotion and implementation of state plans and policies:**

Coastal Act (1976), Public Resources Code Section 30210 on public access and recreation calls for “maximum access, which shall be conspicuously posted, and recreational opportunities shall be provided for all the people consistent with public safety needs and the need to protect public rights, rights of private property owners, and natural resource areas from overuse,” and Section 30214 calls for public access and recreation that “takes into account the need to regulate the time, place, and manner of public access depending on the facts and circumstances in each case...”

Completing the California Coastal Trail 2003. The project constructs new sections of California Coastal Trail. Goal 1 for Humboldt County is to implement the Humboldt Bay Trails Feasibility Study to develop a continuous trail system around the east side of Humboldt Bay.

California @ 50 Million: The Environmental Goals and Policy Report. The project meets “Goal 2: Build Sustainable Regions that Support Healthy, Livable Communities” by constructing a trail that will support increased bicycling and walking.

The California Blueprint for Bicycling and Walking 2002. The project will construct new sections of Caltrans Class I bicycle route (separated path), which will help achieve the goal of increasing the number of bicycle and walking trips statewide by 50%.

4. **Support of the public:** See Exhibit 2: Project Letters.
5. **Location:** The proposed project is located within the coastal zone of the City of Eureka.
6. **Need:** While the City and its partners have raised significant funds for the project, they are not sufficient for implementation without the Conservancy’s contribution.
7. **Greater-than-local interest:** The proposed project will construct a new section of the California Coastal Trail and therefore contributes to the long-term state goal of completing an uninterrupted coastal trail from Oregon to Mexico.
8. **Sea level rise vulnerability:** The project area is located directly adjacent to Humboldt Bay and is therefore vulnerable to sea level rise in the long term. However, over the 20 year lifetime of the project, sea level rise impacts are expected to primarily consist of inundation during winter storms. The proposed trail is on level ground at the same distance from the bay as frontage roads and is unlikely to be significantly damaged by flooding. Day use facilities that could be disturbed by flooding will be anchored in place. Because there would be few users of the trail during inclement winter weather, such impacts are expected to have a minimal effect on the project’s benefits. Project improvements, such as signage, benches and picnic tables, will be designed for durability and resistance to deterioration in order to minimize their vulnerability to storm damage.

According to an analysis by the City of Eureka, sections of the trail will start to become vulnerable to sea level rise in about 40 to 50 years (2055-2065). At that time, the boardwalk in the Phase C segment will likely need to be relocated. The City has prepared for that possibility by identifying a potential future alignment for the trail along property owned by the City of Eureka and the Northcoast Rail Authority.

Additional Criteria

9. **Urgency:** Other funding approved for this project has a limited window in which it is able to be used. Funding from the Conservancy will be most effective if it is used within this same period.
10. **Leverage:** See the “Project Financing” section above.
11. **Readiness:** The grantee has experience completing trail projects in a timely fashion. Environmental review is complete for the project and permitting is well underway. The City expects to begin construction in May of 2016.
12. **Realization of prior Conservancy goals:** “See “Project History”

CONSISTENCY WITH LOCAL COASTAL PROGRAM POLICIES:

The City’s 1997 General Plan Policy Document (“GPPD”), which was certified by the Coastal Commission as an update to the City’s Local Coastal Program in 1999, contains several policies consistent with implementation of the project:

Goal 5.B.1: The City shall provide public open space and shoreline access throughout the Coastal Zone, particularly along the waterfront and First Street, through all of the following...

- c. Establish scenic vista points at numerous locations along the waterfront, including construction of a public access vista point at the foot of Truesdale Street.

Goal 5.B.7. The City shall establish a coordinated continuous public access system throughout its Coastal Zone, consisting of pedestrian walkways, nature walks, and bikeways with necessary support facilities...

Goal 5.B.10. To the maximum extent feasible, the City shall ensure universal public access to the waterfront, including support facilities.

COMPLIANCE WITH CEQA:

A. Eureka Waterfront Trail

Pursuant to the California Environmental Quality Act (CEQA), the City, as the lead agency, prepared and adopted three mitigated negative declarations (MNDs) – one for each of the three proposed segments of the Eureka Waterfront Trail (Exhibit 3):

Eureka Waterfront Trail Project Phase A Initial Study and Mitigated Negative Declaration; adopted by the City of Eureka on October 21, 2014;

Eureka Waterfront Coastal Trail Initial Study and Mitigated Negative Declaration; adopted by the City of Eureka on June 19, 2012; and

Eureka Waterfront Trail Phase C CEQA Initial Study & Proposed Negative Declaration; adopted by the City of Eureka on March 28, 2014.

The City initially planned to build the three trail segments in phases over a long period of time and therefore decided to approach each phase as a standalone project, and completed separate CEQA analyses for each phase. Due to the substantial support for the project and successful

fundraising efforts, the City has been able to accelerate the construction schedule, and expects to construct all three phases of the trail over the next three years. Because of the accelerated timeline, the City adopted a single Mitigation and Monitoring Plan for wetland impacts (in November 2015) that covers all three phases.

The MNDs identified no impacts with regard to agricultural resources, green house gas emissions, mineral resources, public services, and recreation. Each MND found less than significant impacts in the following areas: aesthetics (additional low-level, low glare lighting will be on for a few hours after sunset), geology and soils (compliance with the Universal Building Code will comply with soil seismic and soil standards), noise (construction noise will be of limited duration and intensity), transportation (roadways providing access to the project sites have the capacity to support anticipated increases without additional delays), utilities (slight increase in waste disposal).

For all other categories of potential impact, the MNDs found that all three phases would have less than significant impacts once applicable mitigation measures were incorporated, as follows:

Air Quality: Air quality impacts will be limited to the construction period and will include mitigation measures to ensure dust control. The proposed project is not expected to increase vehicle miles traveled and might result in reduced vehicle miles traveled.

Biological Resources: Sensitive biological resources at each site will be avoided whenever feasible.

Phase A has the potential to impact a number of bird species including the Brown Pelican, Northern harrier, White-tailed kite, Short-eared owl, Vaux's Swift, Purple Martin, Loggerhead Shrike, Little Willow Flycatcher, Yellow Breasted Chat, and the Yellow Warbler. Impacts will be avoided by managing human disturbance (Mitigation Measure BIO-5), and avoiding construction during nesting season (Mitigation Measures BIO-6, BIO-7). Mammals are not likely to be impacted.

Phase B is through a largely urban area and is unlikely to impact sensitive bird or mammal species.

Phase C will not likely impact any bird species, however if construction must take place during breeding season a qualified biologist will conduct preconstruction surveys to verify the absence of nesting migratory birds. If nesting birds are found they will be avoided with the appropriate buffers (Mitigation Measure IV-1d). Mammals are not likely to be impacted.

Special status plant species identified at each site will be avoided. If it is not possible to avoid special-status plant species such as Layngbye's sedge, Humboldt Bay owl's clover, and Point Reyes Bird Beak during construction, they shall be conserved through translocation and/or replanting or re-seeding in the immediate project area. (Phase C, Mitigation Measure IV-1a)

Minor filling and grading of wetland areas are expected to be required for trail construction in all three phases. The total area of wetland fill for all three phases is 0.364 acres. There will be temporary impacts to 0.35 acres of salt marsh and 0.04 acres of willow. Potential impacts will be avoided or mitigated through sensitive habitat fencing, and on-site restoration of 1.1 acres of salt marsh for a ratio of wetlands restored to wetlands filled of approximately 4:1. Willow will be mitigated at approximately 2:1. A Storm Water Pollution Prevention Plan ("SWPPP") will be implemented to reduce sedimentation and erosion into sensitive areas.

Cultural Resources: An archaeological survey of the project area determined that the trail and trail heads pose no physical threat to surface archeological resources. However, there are known archaeological sites near Phase A. If ground disturbance exceeds 12 inches near a known cultural resource site, the City of Eureka will retain a qualified archeologist and Native American Monitors, if requested by the Wiyot Tribe/Table Bluff Reservation, Bear River Band of Rohnerville Rancheria, or Blue Lake Rancheria, to monitor daily construction activities near these sites. If any cultural resources are encountered during construction in these areas, or elsewhere on the project site, they will be evaluated and protected through work stoppages and consultation with a cultural resources specialist.

Hazards and Hazardous Materials: Potential impacts resulting from hazardous materials used onsite during construction will be mitigated through compliance with a spill response plan in the event of any release of a hazardous substance. No contaminated soils are thought to be present in the project area. However, if during project construction there is any evidence of contaminated soils on the site, either from visual observations or odors indicative of regulated substances, the City will perform soil sample analyses. The findings of the analyses will be submitted, as applicable, to the Regional Water Quality Control Board ("RWQCB"), Department of Toxic Substance Control ("DTSC"), and other appropriate regulatory agencies. The City will comply at all times with the requirements and regulations of the RWQCB, DTSC, and other agencies with regard to the handling, transport, and disposal of hazardous materials such as contaminated soils to the satisfaction of the applicable agencies.

Hydrology and Water Quality: Potentially increased stormwater contamination and stormwater flows onto adjoining properties or environmentally sensitive habitat areas during and after construction will be mitigated through the implementation of a SWPPP approved by the appropriate agencies. The SWPPP will include low impact development techniques (permeable pavements/surfacing, green roofs, bioretention and or vegetated swales) that will infiltrate stormwater on-site so that post development hydrology mimics pre-development. Best Management Practices will include maintenance and cleaning of the parking areas a regular basis. No contaminants from construction operations will be allowed to enter or be placed where they can enter any portion of the drainage system of the City of Eureka. The project is located in a tsunami run-up zone. To mitigate for public exposure to tsunami hazard, each trailhead location will have signage informing the public of what actions to take in the event of seismic activity.

Finally, the MNDs indicate that the project will not have the potential for significant cumulative environmental effects.

The City has adopted a mitigation, monitoring and reporting plan for each of the MNDs.

Staff has independently reviewed the City's three MNDs and concurs that there is no substantial evidence that the project as mitigated will have a significant effect on the environment. Staff therefore recommends that the Conservancy find that the project does not have the potential for an adverse effect on the environment as defined in 14 Cal. Code of Regulations, Section 15382. Staff will file a Notice of Determination upon approval of the project.

B. Demolition

The proposed project includes the demolition of blighted, partial structures on Parcel 4 near the location of the Phase A trail. The Parcel 4 partial structures are the remnants of the Holmes-Eureka Lumber Mill and in recent years have become an attractive nuisance for illegal activities

and homeless encampments. The empty partial structures consist solely of reinforced concrete, and the demolition will entail only the removal of these above-ground partial structures. The demolished concrete will be ground up and recycled for use in the trail construction. The proposed demolition is categorically exempt from CEQA pursuant to the CEQA Guidelines at 14 Cal. Code of Regs. § 15301, which exempts the repair, maintenance and minor alteration of existing public facilities and structures involving no expansion of use. The removal of these remnants consists of a minor alteration of an existing public facility, which is the City's land that is suitable for public access and a trail, by removing a public nuisance. Although the examples provided for this categorical exemption include demolition only of single or multi-family residences and small commercial structures, the proposed demolition falls within this exemption because it involves only the removal of remnants of large commercial structures that are now empty and consist only of concrete. Demolition of these remnants will have fewer environmental effects than demolition of a complete small commercial structure. Accordingly, the proposed demolition is exempt from CEQA and staff will file a Notice of Exemption upon Conservancy approval.